

**Department of Health**  
**Chiropractic Quality Assurance Commission**

# Guidance Statement

<i>Title: Chiropractic X-ray Technicians and Classroom Hours</i>		<i>Number: 11-12-20</i>
<i>References:</i>	RCW 18.25.180 and WAC 246-808-215	
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<i>Effective Date:</i>	November 12, 2020	
<i>Supersedes:</i>	N/A	
<i>Approved By:</i>	David Folweiler, D.C., Chair, Chiropractic Quality Assurance Commission	

The Chiropractic Quality Assurance Commission (CQAC) will not find X-ray technicians or approved educational programs deficient if “classroom instruction” is provided virtually, with interaction between the instructor and student. This guidance statement will remain effective until it is withdrawn by CQAC at an open public meeting, or until the Governor issues a proclamation declaring the termination of the state of emergency declared by [Proclamation 20-05](#), as amended by any subsequent amendatory proclamations, whichever is earlier.

Chiropractic x-ray technicians are registered with CQAC under [RCW 18.25.180](#). [RCW 18.25.180\(2\)](#) allows CQAC to adopt rules for chiropractic X-ray technicians.

CQAC has adopted rules for chiropractic X-ray technicians in [WAC 246-808-215](#). One of the rules requires applicants to provide “satisfactory completion of a course of **classroom instruction** of at least forty-eight hours which has been approved by [CQAC]” ([WAC 246-808-215\(2\)\(a\)](#)) (emphasis added). In addition, educators of prospective chiropractic X-ray technicians may “request [CQAC] approval of a course of **classroom instruction**” by submitting information that the course meets minimum standards” ([WAC 246-808-215\(4\)](#)) (emphasis added).

Traditionally, courses of classroom instruction for chiropractic X-ray technicians have been taught via “in-person instruction”. However, the COVID-19 public health emergency has required course providers to consider shifting to the provision of “virtual instruction”. As a result, CQAC has received questions from course providers as to whether [WAC 246-808-215](#) permits “virtual instruction.”

While CQAC interprets [WAC 246-808-215’s](#) “classroom instruction” requirement to mean “in-person” instruction, CQAC appreciates the potential threat posed by COVID-19 to educators and students who are in close physical proximity for extended periods. Consequently, CQAC decided at its September 10, 2020 business meeting that it will not find X-ray technicians or approved educational programs deficient if “classroom instruction” is provided virtually, with interaction

between the instructor and student. In addition, this position will be maintained until it is withdrawn by CQAC at an open public meeting, or until the Governor issues a proclamation declaring the termination of the state of emergency declared by [Proclamation 20-05](#), as amended by any subsequent amendatory proclamations, whichever is earlier.



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Prepared By: Robert Nicoloff, Executive Director

November 12, 2020

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Date



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Approved By: David Folweiler, DC, Chair

November 12, 2020

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